Case: 4:20-cv-00407-MTS Doc. #: 43 Filed: 12/07/20 Page: 1 of 3 PageID #: 675

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

ASHFAQ HUSSAIN SYED, et al.,)
Plaintiffs,)) Case No.: 4:20-cv-00407-MTS
V.)
FRONTIER AIR LINES, INC., et al.,)
Defendants.)

MOTION REQUESTING ORAL ARGUMENT

Comes now the Defendant, Hallmark Aviation Services L.P. [hereinafter Hallmark], by and through its attorneys, HeplerBroom LLC, and with the consent of all parties, requests oral argument on its pending Motion to Dismiss.

- 1. That on or about March 20, 2020, Hallmark filed its Motion to Dismiss [#10] while the case was still pending before Judge Fleissig.
- 2. That the motion has been fully briefed by the parties with a Memorandum filed by Hallmark in Support of the Motion [#11], a Response filed by the plaintiffs [#19] and a Reply to the response filed by Hallmark [#20].
 - 3. That codefendant, Frontier Airlines, has filed a Joinder in the Motion [#34].
- 4. That the depositions of the plaintiffs have been taken; plaintiffs' counsel wishes to take additional depositions of fact witnesses and defendant representatives. It would benefit all the parties to narrow the issues prior to further discovery.

WHEREFORE, for the reasons set forth in, Defendant, Hallmark Aviation Services L.P., prays for leave of court to present oral argument on its pending Motion to Dismiss.

Case: 4:20-cv-00407-MTS Doc. #: 43 Filed: 12/07/20 Page: 2 of 3 PageID #: 676

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PROOF OF SERVICE

The undersigned certifies that on this 7^{th} day of December, 2020 a true and correct copy of the foregoing document was served via E-Mail and first class U.S. Mail, postage prepaid, upon:

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Case: 4:20-cv-00407-MTS Doc. #: 43 Filed: 12/07/20 Page: 3 of 3 PageID #: 677

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